

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE
OF COLORADO, STATE OF
ILLINOIS, STATE OF INDIANA,
STATE OF IOWA, STATE OF
MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE
OF TEXAS, STATE OF
WASHINGTON, and STATE OF
WISCONSIN, et al.,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION
AG, SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION,
LLC, and CORTEVA, INC.

Defendants.

CASE NO. 1:22-CV-828-TDS-JEP

**DEFENDANTS' JOINT SUPPLEMENT TO
DEFENDANTS' RESPONSES TO PLAINTIFF FTC'S
MOTION TO SEAL**

Defendants Syngenta Crop Protection AG, Syngenta Corporation and Syngenta Crop Protection, LLC (together, "Syngenta") and Corteva, Inc. ("Corteva") (collectively, "Defendants"), by and through their undersigned attorneys, under Local Rule 5.4 and at the request of the Court, hereby file this joint supplement to Defendants' respective responses to Plaintiff FTC's Motion to File Portions of Plaintiffs' Memorandum in Opposition to Defendants'

Motions to Dismiss Temporarily Under Seal. Plaintiff FTC's Motion is at ECF No. 111. Defendant Syngenta's Response to Plaintiff FTC's Motion to Seal and accompanying materials are at ECF Nos. 117, 86-1, 101, 118, and 118-1. Defendant Corteva's Response to Plaintiff FTC's Motion to Seal and accompanying materials are at ECF Nos. 119, 88-1, 97, and 120.

Attached as Exhibit A to this joint supplemental filing by Defendants is a *proposed* joint redacted version of Plaintiffs' Memorandum in Opposition to Defendants' Motions to Dismiss. This document redacts the confidential information of both Syngenta and Corteva that the Defendants have requested remain under seal through their respective responses to Plaintiff FTC's Motion to Seal. Defendants have conferred with Plaintiffs about these proposed redactions and Plaintiffs do not object to the sealing of the Defendants' confidential information that is redacted in Exhibit A.

Should the Court grant the unopposed relief requested by Defendants in their respective responses to Plaintiff FTC's Motion to Seal, the proposed joint redacted document that is Exhibit A to this supplemental filing would be the public redacted version of Plaintiffs' Memorandum in Opposition to Defendants' Motions to Dismiss. The original public redacted version of this document was filed by Plaintiffs at ECF No. 110.

This the 3rd day of March 2023.

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